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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ESTATE OF LACY LLOYD THOMAS,

Plaintiff

vs.

CLARK COUNTY, NEVADA,

Defendant

Case No. 2:18-cv-1615-CDS-MDC

**ORDER APPROVING  
STIPULATION TO EXTEND  
BRIEFING DEADLINES  
PERTAINING TO DEFENDANT’S  
MOTION FOR SUMMARY  
JUDGMENT  
(SECOND REQUEST)**

[ECF No. 99]

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6, this Court’s Local Rule LR IA 6-1 and Local Rule of Civil Practice 7-1, the parties hereby jointly submit this Stipulation to extend the current briefing deadlines related to Defendant’s motion for summary judgment (“MSJ”) previously filed on November 22, 2024. See ECF No. 96. At present, Plaintiff’s response to the pending dispositive motion is due on January 7, 2025, the Court having granted the parties’ prior extension request. ECF No. 98. Defendant’s reply to Plaintiff’s response is due 14-days thereafter or January 21, 2025. ECF No. 98. This is the parties’ second request for an extension of the briefing schedule related to Defendant’s MSJ. Since filing the last request for extension of time, counsel for Plaintiff was diligently working to complete Plaintiff’s response. However, in mid-December of last year, counsel for

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Plaintiff became ill with the flu and has had a prolonged and difficult recovery period which prevented him from working to meet the current deadline in this, as well as other, cases. This unforeseen event has significantly impacted Plaintiff's counsel's ability to dedicate the time and focus needed to complete a proper response in this case and has required him to coordinate the extension of other deadlines in other cases. However, given the remaining work that is needed to be completed, counsel for Plaintiff believes a short extension of an additional 8-days, or until January 15, 2025, will be sufficient time to allow completion of the response to Defendant's MSJ. The parties request that the Court also approve this Stipulation to extend Defendant's time to file a reply brief 16-days thereafter, or on January 31, 2025.

Given that discovery has been completed in this case and that the Court has not yet set a trial date, a continuance of the current briefing schedule will not meaningfully delay proceedings. Indeed, the additional time requested herein (a short extension of 8-days) will still allow Defendant's MSJ to be fully briefed before the end of this month.

In light of the foregoing, the parties respectfully request that the Court approve this Stipulation to permit Plaintiff to file a response to the MSJ on or before January 15, 2025 and for Defendant to file a reply to that response on or before January 31, 2025.

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1 For the reasons set forth above, the parties respectfully request that the Court approve  
2 this Stipulation for a short extension of time to complete briefing pertaining to the pending  
3 MSJ.

4 DATED this 2<sup>nd</sup> day of January 2025.

5  
6 /s/ Thomas W. Dillard

Respectfully submitted,

7 \_\_\_\_\_  
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/s/ Paul S. Padda

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14 *Counsel for Defendant Clark County*

*Counsel for Plaintiff*

15 Based on parties' stipulation, plaintiff's deadline to file a response to  
16 the motion for summary judgment is extended to January 15, 2025; and  
17 defendant must file a reply to that response on or before January 31, 2025.

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20 UNITED STATES DISTRICT JUDGE

21 DATED: January 6, 2025